

Message

**From:** Gallagher, Theresa (R3) [gallagher.theresa@epa.gov]  
**Sent:** 3/28/2023 5:58:54 PM  
**To:** Galarza-Hernandez, Arlin [Galarza-Hernandez.Arlin@epa.gov]  
**Subject:** RE: Trinseo Release - Write up needed

Arlín, see below for my draft and let me know if you need additional explanation, background, or changes made. I did not get into the nuances of CERCLA release reporting (releases that stay on-site) to the NRC and EPCRA release reporting (releases that go off-site) to the SERC and LEPC. When EPCRA reviews a release in the NRC log, we usually just check to see when they reported. If they clear what we consider to be reasonably "immediate", we typically do not check further to see if the SERC and LEPC have been contacted. Just providing this explanation to you in case someone asks...

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In accordance with the emergency release notification requirements of EPCRA and CERCLA, a facility must immediately report a release of an Extremely Hazardous Substance or a CERCLA-defined hazardous substance that meets or exceeds the Reportable Quantity in a 24-hour period. NRC Report #1363073 provides information indicating that the Trinseo Altugas facility located in Bristol, PA contacted the NRC at 11:22 PM on March 24, 2023 to report a release of 90,000 lbs. of latex-finished material that began at approximately 10:30 PM on March 24, 2023. The time lapse for this call (under an hour) is considered to be reasonable, meets the interpretation of "immediate", and is consistent with past practices in evaluating reporting times for emergency releases to the NRC. Because of these reasons, the EPCRA Program recommends no further action on the Trinseo Altugas release and would consider it to be closed out.

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**From:** Galarza-Hernandez, Arlin <Galarza-Hernandez.Arlin@epa.gov>  
**Sent:** Tuesday, March 28, 2023 9:37 AM  
**To:** Gallagher, Theresa (R3) <gallagher.theresa@epa.gov>; Beckley, Patrick <Beckley.Patrick@epa.gov>; Fisher, Liam <Fisher.Liam@epa.gov>; Longenecker-Wright, Zoe <LongeneckerWright.Zoe@epa.gov>  
**Subject:** Trinseo Release - Write up needed  
**Importance:** High

Hi Team,

We need to provide a write up on the analysis we did yesterday and today regarding RMP/GDC/EPCRA applicability. Let's describe what's required and why this scenario and/or facility isn't subject to them. Let's shift priorities today to work on this, so we can have a final draft by the end of the day. The RMP team can split the work and then consolidate in one email to me.

Thank you,



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